

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE PHILLIES, a Pennsylvania limited  
partnership

Plaintiff,

v.

HARRISON/ERICKSON, INCORPORATED,  
a New York corporation, HARRISON  
ERICKSON, a partnership, and WAYDE  
HARRISON and BONNIE ERICKSON,

Defendants.

CASE NO. 1:19-cv-07239-VM

ORAL ARGUMENT REQUESTED

**DEFENDANT/COUNTERCLAIM PLAINTIFFS' NOTICE OF  
MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the declarations of Bonnie Erickson, Wayde Harrison, David Zung, and Paul Montclare, and exhibits thereto, Defendants/Counterclaim Plaintiffs' Statement of Undisputed Facts pursuant to Local Civil Rule 56.1, and upon all prior pleadings, proceedings, and filings in this Action, Defendants/Counterclaim Plaintiffs Bonnie Erickson, Wayde Harrison, Harrison Erickson, and Harrison/Ericksen, Incorporated (collectively, "H/E") will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 15B, New York, New York, before the Honorable Victor Marrero, for an order awarding H/E Summary Judgment on their First Four Counterclaims and dismissing all Eight Counts of The Phillies' Complaint.

DATED: January 20, 2021  
New York, New York

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